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8 BRENDA ALCANTARA

9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

12
13 URSULA BYRAM, S.B. by and
14 through guardian ad litem TIMOTHY
15 BYRAM, N.B. by and through guardian
16 ad litem TIMOTHY BYRAM, and A.B.
17 by and through guardian ad litem
18 KAITLYN HUMENCHUK,
19 individually and as successors-in-
20 interest to Everett Byram,

21 Plaintiffs,

22 v.

23
24 COUNTY OF LOS ANGELES,
25 BLAKE RUNGE, and BRENDA
26 ALCANTARA,

27 Defendants.
28

Case No. 2:23-cv-09285-KS

**JOINT STIPULATION FOR
ORDER CONTINUING PRETRIAL
FILING DEADLINES**

[Assigned to Hon. Karen L. Stevenson,
Courtroom 580]

29
30 TO THE HONORABLE COURT, ALL PARTIES, AND TO THEIR
31 COUNSEL OF RECORD:

32 Plaintiffs Ursula Byram, S.B. by and through guardian ad litem Timothy
33 Byram, N.B. by and through guardian ad litem Timothy Byram, and A.B. by and
34 through guardian ad litem Kaitlyn Humenchuk and Defendants County of Los

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1 Angeles, Blake Runge and Brenda Alcantara (collectively “Parties”), through their
2 respective attorneys of record, hereby stipulate to the following:

3 1. This request for a continuance of the trial filings (second set) is made
4 because the Parties continue to engage in efforts to resolve the case without further
5 litigation; and

6 2. Defendants' counsel has a multitude of schedule conflicts with the
7 currently set deadline.

8 3. The Parties have met and conferred with each other and the Court and
9 selected December 10, 2024 as a mutually agreeable deadline for the trial documents
10 (second set.)

11 4. The Parties seek to continue the trial filings (second set) deadline to
12 minimize costs in hopes of more easily facilitating a successful settlement.

13 5. Good cause exists for this continuation given that Defendants' trial
14 counsel is currently engaged in another matter and continuing the trial filings (second
15 set) deadline will assist in facilitating a successful settlement.

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6. Working together, the Parties agree to continue the trial filings (second set) filing deadlines as follows:

	Current Deadline	Proposed Deadline
Trial Filings (Second Set)	November 26, 2024	December 10, 2024

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: November 22, 2024

THE LAW OFFICES OF DALE K. GALIPO

By: /s/ Cooper Alison-Mayne

DALE K. GALIPO

COOPER ALISON-MAYNE

Attorneys for Plaintiffs

DATED: November 22, 2024

HURRELL CANTRALL LLP

By: /s/ Jordan S. Stern

THOMAS C. HURRELL

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NICOLE G. ORTEGA

Attorneys for Defendants, COUNTY OF
LOS ANGELES, BLAKE RUNGE and
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